

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON, et al., :  
Plaintiffs, :  
v. : C.A.No. 05-823-\*\*\*  
STANLEY TAYLOR, et al., : JURY TRIAL REQUESTED  
Defendants. :

PLAINTIFF'S MOTION FOR LEAVE TO DEPOSE DEFENDANTS

COME NOW Plaintiff George A. Jackson, et al., on behalf of themselves and all others similarly situated, pro se, and respectfully move this Honorable Court to enter an Order granting Plaintiff George A. Jackson the right to depose Defendants Stanley Taylor, Joyce Talley, Carl Anson, Debbie Melvin, Wenston White, Chris Sentao, Joseph Adkins, Bethany Evans, Robert Manuel, Richard Crockett, Steven Raynor and Michael Knight ("Defendants"), State Defendants:

1. Plaintiffs' and plaintiff class claims arise out of the inadequate ventilation and air flow provided to them while working at the Sussex Correctional Institution ("SCI") main kitchen unit.
2. During the time of filing the Amended Complaint, all named Defendants were employees of the Delaware Department of Correction. \*Note\* Defendant Taylor no longer work for the Delaware Department of Correction due to his retirement of this year.
3. Plaintiffs wishes to depose Defendants as part of discovery in this case.
4. There is no set discovery deadline as of yet in this matter, and Plaintiffs are being diligent in keeping the case moving forward toward resolution, including resolution by trial.
5. Fed.R.Civ.P. Rules 30(a)(2)(A), 31(a)(2)(A) requires leave of the Court to proposed depositions which would result in more than 10 deposition Taken.

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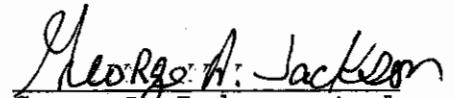
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taken.

6. Since all Plaintiffs are incarcerated at the Sussex Correctional Institute in Georgetown, Delaware, Plaintiffs further ask that the Court order Defense counsel to initiate the scheduling and arrangement for Plaintiffs' right to depose defendants.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court grant their Motion for Leave to Depose Defendants Stanley Taylor, Joyce Talley, Chris Senato, Joseph Adkins, Bethany Evans, Robert Manuel, Richard Crockett, Carlton Anson, Debbie Melvin, Steven Raynor, Wenston White and Michael Knight.

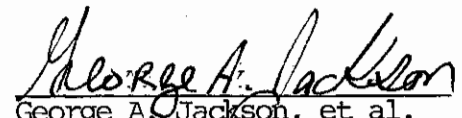
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George A. Jackson, et al  
Sussex Correctional Institute  
P.O. Box 500  
Georgetown, DE 19947

CERTIFICATE OF SERVICE

I hereby certify that on April 4, 2007, I filed PLAINTIFF'S  
MOTION FOR LEAVE TO DEPOSE DEFENDANTS with the Clerk of Court by  
placing said motion in the SCI prison U.S. mail box to be forward to:

Eileen Kelly  
Deputy Attorney General  
Department of Justice  
820 N. French Street., 6th FL  
Wilmington, DE 19801

  
George A. Jackson, et al.  
Sussex Correctional Institute  
P.O. Box 500  
Georgetown, DE 19947

*I/M George A. Lockbox, Jr. MERT*  
SUSSEX CORRECTIONAL INSTITUTION  
P.O. BOX 500  
GEORGETOWN, DELAWARE 19947

*U.S. District Court*  
*Lockbox 18*  
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*Wilmington, DE*  
*19801*

*U.S.M.G.*  
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